

Message

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Sent: 11/15/2017 1:17:40 PM
To: Keigwin, Richard [Keigwin.Richard@epa.gov]; Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]; Beck, Nancy [beck.nancy@epa.gov]; Wise, Louise [Wise.Louise@epa.gov]
CC: Keller, Kaitlin [keller.kaitlin@epa.gov]; Dinkins, Darlene [Dinkins.Darlene@epa.gov]; Sisco, Debby [Sisco.Debby@epa.gov]; Strauss, Linda [Strauss.Linda@epa.gov]; Dunton, Cheryl [Dunton.Cheryl@epa.gov]
Subject: RE: Follow-up to 11/14 OPP General: Correcting Respirator Label Language

Rick

This seems very reasonable, and very much in keeping with Administrator Pruitt's idea of reduced burden, state interaction and better protection. Perhaps this is something that the OPP communication office can work up for the administrator's communication folks?

Or is this too small of an overall effort?

Cheers!

Michael

From: Keigwin, Richard
Sent: Wednesday, November 15, 2017 7:22 AM
To: Bertrand, Charlotte <Bertrand.Charlotte@epa.gov>; Beck, Nancy <Beck.Nancy@epa.gov>; Wise, Louise <Wise.Louise@epa.gov>; Dourson, Michael <dourson.michael@epa.gov>
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Subject: Follow-up to 11/14 OPP General: Correcting Respirator Label Language

As we discussed during Tuesday's General, OPP would like to issue an OPP Update to seek comment on proposed revised respirator language to correct the respirator designations on pesticide labels. In 1995, NIOSH updated their regulations for certifying air-purifying particulate respirators. In 2015, the states raised concerns that incorrect respirator statements may be on labels. An OPP team evaluated the situation and determine that the respirator language being used on pesticide labels is either as protective or more protective than the updated respirator wording currently being used. However, the outdated terminology needs to be changed because it potentially puts the mixer/loader/applicator and their employer in the position of 1) searching for a respirator that is no longer available; 2) purchasing the incorrect respirator that is costly and unnecessarily overprotective; and/or 3) lacking awareness of what respirator, canisters, cartridges, and/or filters to use.

Attached is the briefing paper that we used during yesterday's discussion. I've also attached a draft of the updated section of the Label Review Manual, the resource that OPP risk managers use in their review of labels and a document that we've made available to stakeholders for many years, that would be the substantive document that would be issued for public comment.

Below is the current draft of the OPP Update that we would issue to open the comment period:

Ex. 5 Deliberative Process (DP)

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Rick Keigwin
Director, Office of Pesticide Programs
US Environmental Protection Agency